

United States Bankruptcy Court
District of Massachusetts

In re: Mary Derbes and Kimal Abdo)
Derbes,) Case No.: 25-10385
)
 Chapter 7
Debtors)
)

**DEBTORS' MOTION TO AMEND
VOLUNTARY PETITION SCHEDULES**

NOW COMES Debtors, Mary Derbes and Kimal Abdo Derbes, in the above-captioned matter and hereby request to amend Schedule D and the Summary of Assets and Liabilities by substituting the attached Amended Schedule D and the Summary of Assets and Liabilities, for the ones previously filed pursuant to Fed. R. Bankr. P.1009.

In support thereof, Debtors state the following:

- Amended Schedule D reflects the “disputed” nature of the two secured claims by creditor Lumaghini Family Trust.

WHEREFORE, Debtors pray that this Honorable Court enter an order:

1. Confirming Debtors’ Amended Schedule D and Amended Summary of Assets and Liabilities, attached hereto, as part of Debtors’ Voluntary Petition; and
2. Substituting the previously filed Schedule D, and Amended Summary of Assets and Liabilities, with the schedule and Summary of Assets and Liabilities attached hereto.

Respectfully Submitted,
By their Attorney,

Dated: 4/1/25, 2025

By: /s/ Wayne V. Gilbert

Wayne V. Gilbert
Gilbert Law Offices, P.C.
100 Ledgewood Place, Suite 102
Rockland, MA 02370
(781) 340-9505
BBO# 640986